

DEPARTMENT OF THE ARMY US ARMY MEDICAL RESEARCH AND MATERIEL COMMAND 504 SCOTT STREET FORT DETRICK, MD 21702-5012

20 February 2003

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Command Policy, 2003-01, USAMRMC Licensure, Credentialing and Privileging Program

1. Reference:

- a. Command Policy 2001-01, Professional Licensure, is being superceded by this policy.
- b. Command Policy 2002-01, Approval Authority for Physician "Applications of Request for Waiver of Administrative Licensure Requirements.
- c. Medical Services Quality Assurance Administration Army Regulation 40-68, 20 December 1989
- d. Medical Services Nonphysician Healthcare Providers Army Regulation 40-48, 7 November 2000.
- e. U.S. Army Medical Command Basic Credentialing and CCQAS Training Manual, June 17 –21, 2002.
- f. Centralized Credentials Quality Assurance System (CCQAS) Training Guide, 16 July 2002.
- 2. Purpose. This memorandum establishes the U.S. Army Medical Research and Materiel Command (USAMRMC) policy for ensuring that the Licensure, Credentialing and privileging requirements per AR 40-68 are met.
- 3. Applicability and Scope. This memorandum is applicable to all USAMRMC personnel appointed as the POC for Licensure, Credentialing and Privileging.
- 4. Policy. The POC for Licensure, Credentialing and Privileging at WRAIR, USARIEM, USAISR, USAMRICD, USAARL, USAMRIID, USAMMA, USAMRAA, USAMMDA, USAMMCE, USAHFPA, USAMISSA, USAMRMC, HQ will adhere to the USAMRMC Licensure, Credentialing and Privileging Program. USAMRMC, HQ Licensure, Credentialing and Privileging POC will provide further guidance on the implementation of this policy.
- 5. History. This is a revised credentialing and privileging policy for USAMRMC Healthcare Personnel. USAMRMC-RCQ revised the drafted plan, dated 4 June 2001, to take into account information from the discussion with the MEDCOM staff LTC Janet Wilson and LTC Helen Gant on 13 December 2001 and comments submitted by the USAMRMC subordinate commands with regard to the 8 March 2002 version. This plan was further revised and distributed to

USAMRMC MSCs' Licensure, Credentialing and Privileging Coordinator as well as to LTC Helen Gant (MEDCOM Quality Management Office (QMO) staff) on 16 August 2002. On 9 September 2002, LTC Janet Wilson, Chief, Regulatory Compliance and Quality for MEDCOM QMO, visited USAMRMC, HQ Credentialing Office and provided comments to the 16 August 2002 version. The contents of this document reflect the comments from the reviewers at USAMRMC MSCs as well as comments from LTC Janet Wilson, MEDCOM QMO.

6. List of Assumptions:

- a. Overseas, clinically privileged Healthcare Personnel will comply with their designated Medical Treatment Facility's privileging requirements.
- b. USAMRMC will utilize the designated Department of Defense (DoD) Medical Treatment Facility's credentialing committee to clinically privilege assigned Healthcare Personnel.
- c. USAMRMC will develop authorizing bodies to grant research privileges to researchers performing clinical trials.

7. Background of USAMRMC:

- a. The United States Army Medical Research and Materiel Command (USAMRMC) oversees 12 subordinate commands located throughout the United States. Headquartered at Fort Detrick, MD, the USAMRMC operates six medical research laboratories and institutes in the United States with detachments located domestically and overseas. The six medical research facilities are U.S. Army Medical Research Institute of Infectious Diseases (USAMRIID), Fort Detrick, MD; Walter Reed Army Institute of Research (WRAIR), Washington, D.C.; U.S. Army Medical Research Institute of Chemical Defense (USARICD), Aberdeen Proving Ground, MD; U.S. Army Research Institute of Environmental Medicine (USARIEM), Natick, Mass.; U.S. Army Aeromedical Research Laboratory (USAARL), Fort Rucker, AL.; and U.S. Army Institute of Surgical Research (USAISR), Fort Sam Houston, TX. These laboratories make up the core science and technology capability of the Command.
- b. The medical research areas include development of vaccines, prevention and treatment of tropical diseases, chemical and biological weapon defense, military trauma, and human responses to environmental stressors and occupational situations and testing of military equipment. Medical research activities encompass both administrative and clinical or technical duties related to human, laboratory, and animal research. Healthcare Providers in USAMRMC are assigned to administrative duties, which may include, but are not limited to regulatory affairs, quality assurance, management of the life cycle of a medical research product, and regulatory policy development. Clinical assignments at USAMRMC include Principal Investigators and Medical Monitors involved in medical research where healthy and unhealthy subjects in primarily outpatient research protocols participate.
- c. There are no Medical Treatment Facilities (MTF) within USAMRMC for which USAMRMC is the privileging authority. Many USAMRMC Healthcare Providers choose to perform clinical duties at a MTF. However, in some cases, USAMRMC Healthcare Providers perform clinical duties at a civilian hospital because there is no MTF local to the Healthcare Professional's

USAMRMC duty station. Some USAMRMC Healthcare Providers do not perform any clinical duties.

d. The Command also operates six subordinate units exclusively focused on medical research materiel development, contracting, medical logistics management, health facility planning, and information management and technology. The six subordinate units are U.S. Army Health Facility Planning Agency (USAHFPA), Falls Church VA, U.S. Army Medical Materiel Development Activity (USAMMDA), Fort Detrick, MD, U.S. Army Medical Research Acquisition Activity (USAMRAA), Fort Detrick, MD, U.S. Army Research Medical Materiel Agency (USAMMA), Fort Detrick, MD, U.S. Army Medical Information Systems and Services Agency (USAMISSA), Fort Detrick, MD, and U.S. Army Medical Materiel Center, Europe (USAMMCE).

8. Definitions:

- a. Healthcare Personnel (AR 40-68). Personnel involved in the delivery of Healthcare.
 - (1) Healthcare Provider (HCP) (AR 40-68). Providers of direct patient care services.
- (a) Nonphysician Healthcare Providers (AR 40-48). Military or civilian personnel, other than doctors of medicine or osteopathy, who are authorized and responsible for determining, starting, or altering the regimen of medical treatment provided to a patient whether on a routine or occasional basis.
- (b) Practitioner (AR 40-68). Military or civilian HCPs, given privileges (privileged) to diagnose, initiate, alter, or terminate Healthcare treatment regimens. This definition includes physicians, dentists, nurse practitioners, nurse anesthetists, nurse midwives, podiatrists, optometrist, clinical social workers, clinical psychologists, and physician assistants. When given individual clinical privileges, personnel from the following professions may also be included: physical therapists, occupational therapists, audiologists, clinical dieticians, clinical pharmacist, and speech pathologists.

9. Responsibilities:

- a. The Laboratory/Institute Commander at WRAIR, USARIEM, USAISR, USAMRICD, USAARL, USAMRIID, USAMMA, USAMRAA, USAMMDA, USAMMCE, USAHFPA, USAMISSA, USAMRMC. HQ will:
- (1) Ensure that Healthcare Personnel within their laboratories/institutes are in compliance with the USAMRMC Licensure, Credentialing and Privileging Program.
- (2) Appoint an individual to be the Licensure, Credentialing and Privileging POC who will ensure the compliance to the USAMRMC Licensure, Credentialing and Privileging Program and AR 40-08.
- b. The Licensure, Credentialing and Privileging POC at USAMRMC, HQ (USAMRMC, RCQ/QA) will implement and execute a licensure, credentialing and privileging program that

fulfills the requirements of AR 40.68, Quality Assurance Administration and this policy. The POC will:

- (1) Ensure the compliance of the licensure, credentialing and privileging requirements of all Healthcare Personnel assigned to USAMRMC.
- (2) Have the overall responsibility for the tracking and monitoring of licensure, credentialing, and privileging requirements for Healthcare Personnel assigned to WRAIR, USARIEM, USAISR, USAMRICD, USAARL, USAMRIID, USAMMA, USAMRAA, USAMMDA, USAMMCE, USAHFPA, USAMISSA and USAMRMC, HQ.
- (3) Attend MEDCOM Quality Management Office (QMO) delivered training in Centralized Credentialing and Quality Assurance System (CCQAS) version 2.6.
- (4) Retrieve a monthly Medical Occupational Data Systems (MODs) report to ascertain all USAMRMC assigned Healthcare Personnel are accounted for in USAMRMC's Licensure, Credentialing and Privileging Program.
- (5) Ensure assigned Healthcare personnel being managed, monitored and tracked by USAMRMC, HQ, in/out -process IAW with USAMRMC, HQ guidelines, which includes compliance to the Implementing Guidance for Permissible Waivers of State Physicians Licensure When Administrative or Financial Requirements are In Harmonious with Federal Policy (ASD[HA] Memo, 14 May 99) as well as the guidance on Renewal Fees for physicians.
- (6) Ascertain licenses, Practitioner Credentials Files (PCFs) and Basic Life Support (BLS) training and certification exist and are compliant for all assigned Healthcare Personnel, as appropriate (Appendix A).
- (7) Provide the MSC's Licensure, Credentialing and Privileging POC access privileges to CCQAS to ensure assigned healthcare personnel CCQAS records are accurate and current.
- (8) Provide applicable training on CCQAS and elements of the USAMRMC Licensure, Credentialing and Privileging Program, as appropriate.
- (9) Ensure assigned Healthcare Personnel are captured in CCQAS and PCFs are maintained and managed, as appropriate. NOTE: The original PCF will only be transferred to and from Army credentialing/privileging facilities. Air Force and Navy will receive either an Interfacility Credential Transfer Brief (ICTBs), and/or a copy of the PCF, as appropriate. Non-DoD facilities will receive a copy of the PCF or an agreed upon variation only, as appropriate and as requested (Appendix B).
- (10) Ensure the PCFs are maintained and managed with the required and appropriate credentialing documentation (Appendix C).

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- (11) Review licensure, credentialing, and privileging data and documentation at WRAIR, USARIEM, USAISR, USAMRICD, USAARL, USAMRIID, USAMMA, USAMRAA, USAMMDA, USAMMCE, USAHFPA, and USAMISSA during staff assistance visits.
- (12) Support MEDCOM QMO in the reconciliation of licensure, credentialing, and privileging data of USAMRMC's Healthcare Personnel by working with the USAMRMC MSCs' Licensure, Credentialing and Privileging POCs.
- (13) Forward names of Healthcare Personnel privileged at a Navy or Air Force MTF to MEDCOM QMO, when required.
- (14) Upon the Healthcare Personnel's PCS date, forward or ensure the PCF is forwarded IAW AR 40-68 before the Healthcare Personnel's reporting date to the Commander and/or Credentialing Coordinator of the receiving facility by return mail, return receipt requested.
- (15) Upon the Healthcare Personnel retiring from the military and/or civilian service, process the Healthcare Personnel's records IAW AR 40-68.
- (16) Ascertain that MTFs and civilian MTFs report adverse privileging actions against USAMRMC's assigned Healthcare Personnel to the USAMRMC, HQ's Licensure, Credentialing and Privileging POC and the respective USAMRMC MSC Commander, promptly.
- (17) Notify the Commanding General, USAMRMC, promptly, about the adverse privileging actions, to include details, brought against the assigned Healthcare Personnel.
- (18) Initiate the appeal of the decision regarding adverse privileging actions, on behalf of the assigned Healthcare Personnel, IAW AR 40-68, when applicable.
- (19) Ensure the Commanding General, USAMRMC is promptly informed of final adverse privileging actions (to include details) brought against USAMRMC assigned Healthcare Personnel.
- c. The Licensure, Credentialing and Privileging POCs at WRAIR, USARIEM, USAISR, USAMRICD, USAARL, USAMRIID, USAMMA, USAMRAA, USAMMDA, USAMMCE, USAHFPA, USAMISSA will:
- (1) implement a licensure, credentialing and privileging program that fulfills the requirements of AR 40.68, Quality Assurance Administration and the USAMRMC's Licensure, Credentialing and Privileging Program (document the specifics of your program, to include third parties who may perform the licensure credentialing and privileging functions on your behalf).
- (2) Have the overall responsibility for the tracking and monitoring of licensure, credentialing, and privileging requirements for Healthcare Personnel assigned to their respective organizations.

- (3) Attend MEDCOM delivered training in Centralized Credentialing and Quality Assurance System (CCQAS) version 2.6 and/or an alternate version, as appropriate.
- (4) Retrieve a monthly Medical Occupational Data Systems (MODs) report to ascertain all assigned Healthcare Personnel are accounted for.
- (5) Ensure that a process is in place to in/out-process assigned Healthcare personnel, which includes compliance to the Implementing Guidance for Permissible Waivers of State Physicians Licensure When Administrative or Financial Requirements are In Harmonious with Federal Policy (ASD[HA] Memo, 14 May 99) as well as the guidance on Renewal Fees for physicians.
- (6) Ascertain licenses, Practitioner Credentials Files (PCFs) and Basic Life Support (BLS) training and certification exist for all assigned Healthcare Personnel, as appropriate (Appendix A).
- (7) Ensure assigned Healthcare Personnel are captured in CCQAS and PCFs are maintained and managed, as appropriate. NOTE: The original PCF will only be transferred to and from Army credentialing/privileging facilities. Air Force and Navy will receive either an Interfacility Credential Transfer Brief (ICTBs), and/or a copy of the PCF, as appropriate. Non-DoD facilities will receive a copy of the PCF or an agreed upon variation only, as appropriate and as requested (Appendix B).
- (8) Ensure the PCFs are maintained and managed with the required and appropriate credentialing documentation (Appendix C).
- (9) Ensure the credentialing module within the CCQAS application where the assigned Healthcare Personnel are entered, as appropriate, is current and accurate.
- (10) Support and provide assistance to USAMRMC, HQ POC (MRMC RCQ/QA) in the reconciliation of licensure, credentialing, and privileging data of USAMRMC Healthcare Personnel.
- (11) Provide names of Healthcare Personnel privileged at a Navy or Air Force MTF to USAMRMC, HQ POC (USAMRMC RCQ/QA) (on an update basis).
- (12) Upon the Healthcare Personnel's PCS date, forward or ensure the PCF is forwarded IAW AR 40-68 before the Healthcare Personnel's reporting date to the Commander and/or Credentialing Coordinator of the receiving facility by return mail, return receipt requested.
- (13) Upon the Healthcare Personnel retiring from the military and/or civilian service, forward the names of these individuals to USAMRMC, HQ Credentialing Coordinator.
- (14) Ascertain that MTFs and civilian MTFs report adverse privileging actions against assigned Healthcare Personnel to the USAMRMC, HQ's Licensure, Credentialing and Privileging Coordinator and to the Commander of your organization, promptly.

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- (15) Ensure USAMRMC, HQ's Licensure, Credentialing and Privileging Coordinator is promptly informed of final adverse privileging actions (to include details) brought against the assigned Healthcare Personnel.
- (16) Provide assistance and support to the Licensure, Credentialing and Privileging POC at USAMRMC, HQ, in the administration and sustainment of the USAMRMC Licensure, Credentialing and Privileging Program, relative to assigned Healthcare Personnel.
- 10. The POC for this action is LTC Laura R. Brosch, Deputy, Office of Regulatory Compliance and Quality at DSN 343-7802, commercial (301) 619-7802, email laura.brosch@det.amedd.army.mil.

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LESTER MARTINEZ-LOPEZ

Major General, MC Commanding

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APPENDIX A

License Required or other Authorizing Documentation	Requires a PCF	BLS Training and Certification
 Physicians Dentists Nurses (registered, practical, vocational) Clinical Psychologists Pharmacists Podiatrists Optometrists Dental Hygienist Physical Therapists Social Workers Audiologists Clinical Dieticians Occupational Therapists Speech Pathologists Physician Assistants 	Practitioners NOTE: (prior to appointment to the military, civil service, consultant status, foreign national local hire, or as a contract practitioner, a verification of education, training, experience, licensure and/or certification and/or registration and current competence will be completed to initiate a PCF. The PCF will be kept for the entire service career of the military practitioner and will be kept for the entire period of work within the AMEDD for civilians)	All Healthcare Personnel (civilian or military) assigned, or subject to reassignment, to duties involving the provision of diagnostic or therapeutic direct patient care will possess and maintain basic life support (BLS) certificate of training. Personnel in administrative, maintenance, housekeeping, and other non-direct patient care positions do not require BLS training unless directed by the MTF commander. Others may be excluded from this requirement on a case-by-case basis at the discretion of the MTF commander. Said exceptions will be documented. (Latest draft AR-40-68)

APPENDIX B

What the Civilian Facility receives	If privileged, a copy of the PCF or an agreed upon variation, as appropriate and if requested. If not privileged, "N/A".	N/A	If privileged, a copy of the PCF or an agreed upon variation, as appropriate and if requested. If not privileged, "N/A".
What the DoD/Non-DoD TDY (clinical) facility receives	ICTB from the DoD Credentialing/Privileging UIC (provided the facility has CCQAS v 2.6) or a copy of the PCF or an agreed upon variation, as appropriate	The Healthcare Personnel will need to seek privileges from a DoD credentialing/privileging UIC, at which time, that UIC will forward an ICTB to the clinical TDY facility (provided the facility has CCQAS v 2.6) or a copy of the PCF or an agreed upon variation, as appropriate	ICTB from the DoD Credentialing/Privileging UIC (provided the facility has CCQAS v 2.6) or a copy of the PCF or an agreed upon variation, as appropriate
Who maintains and manages the PCFs	DoD Credentialing/Privileging UIC or DoD Assigned UIC ₍₃₎	Assigned UIC	DoD Credentialing/Privileging UIC ₍₃₎
Who Manages the Healthcare Personnel in CCQAS	DoD Credentialing/Privileging UIC	Assigned UIC	DoD Credentialing/Privileging UIC
is Healthcare Personnel privileged in a Civilian Facility	Yes and No	<u>Q</u>	Yes and No
is Healthcare Personnel privileged in a DoD Facility	Yes (1)	O <u>N</u>	Yes and No _{(1) (2)}
if Healthcare Personnel is	Administratively Assigned to a USAMRMC facility	Administratively Assigned to a USAMRMC facility	Clinically (research based) Assigned to a USAMRMC facility

Note: (1) If privileged in more than one DoD facility, the Healthcare Personnel will designate a primary credentialer/privileger to manage their CCQAS record, preferably an Army UIC if branch of service is Army, or Air Force if branch of service is Air Force, or Navy if branch of service is Navy. (2) Healthcare Personnel who can execute his/her duties without needing privileges, e.g., Pharmacist. (3) All original PCFs for members of the Army, assigned to USAMRMC and Army/Non-Army privileged will be maintained by USAMRMC; non-Army privileged UICs will receive a copy of the PCF or an agreed upon variation. Original PCFs for Non-Army members privileged and/or assigned to an Army facility is determined by their branch of service; at a minimum retrieve a copy of the PCF or a variation.

APPENDIX C

PCF Checklist

	Section 1	n 1		
	ON Hand	Pending	PSV	Remarks
Current ITCB (while on tour)				
Authorization for Release of Information				
DA Form 5753-R (USAR/ARNG Application for Clinical				
Privileges to Perform Active/Inactive Duty Training)				
(Optional)				
DA Form 4691-R (Initial Application for Clinical				
Privileges)				
DA Photo (Optional)				
DA Form 5440-R (Delineation of Privileges) current				
DA Form 5441-R (Evaluation of Privileges) current				
DA Form 4692-R (Clinical Privileges Annual				
Evaluation) current				
DA 5754-R (Malpractice and Privileges Questionnaire)				
current				
	Section 2	n 2		
	ON Hand	Pending	PSV	Remarks
Current Privileges Granted (Scope of practice)				
Peer Letter of Recommendation < 2yrs old				
Peer Letter of Recommendation < 2 yrs old				
DA Form 5374-R (Performance Assessment) (current				
and past)				
	Section 3	n 3		
	ON Hand	Pending	PSV	Remarks
All NPDB reports				
All DA Form 5754-R (Malpractice and Privileges				

Questionnaire)					
Copy of Malpractice Insurance					
Copy of Malpractice Insurance History Claims					
Documents of adverse action					
Letters of notification regarding malpractice					
Letters of decision regarding malpractice					
Malpractice claims with peer review determination					
regarding the standard of care					
	Section 4	on 4			A
	ON Hand	Pending	PSV	Remarks	
MCE (last 3 yrs) - sponsors locations, dates, CME					
hours/unit					
Lectures given					
Papers published					
Special activities					
CV dated, signed, NMT 2 yrs old					
	Section 5	on 5			
	ON Hand	Pending	PSV	Remarks	
ICTB covering the tour, grouped with other privileging					
documents					
DA Form 5440-R or AR (Delineation of Privileges)					
DA Form 5441-R (Evaluation of Privileges - Specialty)					
DA Form 5374-R (Performance Assessments)					
DA Form 5753-R (USAR/ARNG Application for Clinical					
Privileges to Perform Active/Inactive Duty Training)					
DA Form 4692-R (Clinical Privileges Annual					
Evaluation)					
ICTBs/Snapshots from previous assignments (if					
applicable)	ĺ	Į			
Additional Historical data (outdated)					
	Section 6	ou 6			
	ON Hand	Pending	PSV	Remarks	
AMA Physician Profile					

BLS		
license, active & inactive		
DEA Registration		
Board Certification		
Fellowship		
Residency		
Internship		
ECFMG		
Medical Degree		
Dental Degree		
Postgraduate Degrees or Diplomas		
Qualifying Education Degrees		
Provider acknowledgement of DoD physician licensure		
policy requirements - (MC) Only.		